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David J. Sheehan
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Hearing Date: June 28, 2017
Time: 10:00 a.m.

Response Due: June 21, 2017
Time: 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Robert Roman,

Defendant.

Adv. Pro. No. 10-04292 (SMB)

NOTICE OF MOTION TO COMPEL

PLEASE TAKE NOTICE that, upon the accompanying Motion and Memorandum of Law, Irving H. Picard, as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa (“SIPA”), and the estate of Bernard L. Madoff (“Madoff”), by and through his undersigned counsel, will move the Court for entry of the proposed Order, submitted herewith, compelling Defendant Robert Roman to produce certain documents identified in the accompanying Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be (i) in writing, conform to the applicable rules of this Court, and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York, 10004, in accordance with Local Rule 9006-1 of the United States Bankruptcy Court, Southern District of New York by no later than 5:00p.m. on June 20, 2017 (the “Objection Deadline”) (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein); and (ii) served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York, 10111, Attn: David J. Sheehan and Nicholas J. Cremona; and (b) Securities Investor Protection Corporation, 805 15th Street N.W., Suite 800, Washington, D.C., 20005, Attn: Kevin H. Bell, so as to be received no later than the Objection Deadline. Any objections must state the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served with respect to the Motion, the Motion shall be deemed uncontested and an order

granting the requested relief may be entered with no further notice or opportunity to be heard
offered to any party.

Dated: June 14, 2017
New York, NY

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

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